

I am strongly against proposal RM-11306.

The amateur radio community in general has done well using the “good amateur practice” considerations in the rules to self-govern both mode and bandwidth usage throughout the amateur frequency bands. Additional regulations are not needed, will be difficult to enforce, and will place an undue burden on the typical amateur radio operator to measure transmitted bandwidth and ensure compliance.

I am also opposed to the proposal that AM be treated as an exception to a set of established rules. The 9 KHz bandwidth limit may on its face may seem reasonable. But is it reasonable to enforce such a limit, for example, on 75 meters during typical daylight propagation conditions when the band is largely empty and unused? This is, again, an area where “good amateur practice” would result in limiting transmitted bandwidth during crowded band conditions, but not limit bandwidth when it is unnecessary. Treatment of AM as an exception simply serves to open the door for those interests opposed to this mode to ultimately argue for elimination of the “exception”. Most of this opposition comes from a few amateur operators who believe they have been granted the use of certain frequencies in the HF bands “in perpetuity”.

This proposal argues that band segmentation by bandwidth is needed to encourage experimentation. Nothing in the current rules provides any impediment to experimentation and development of new modes. This group has a narrow set of “digital” interests with an unstated agenda of benefiting existing digital technologies at the expense of the community in general. They do not represent the diversity of the community, and are pressing an agenda which will not benefit the vast majority of operators.

Grant Youngman
NQ5T